

REMARKS

This is a full and timely response to the outstanding Office Action mailed May 3, 2007. Upon entry of this response, claims 1, 3-4, 6-15, 17-18, 20-29, and 59-86 are pending in the application. In this response, claims 1, 4, 11, and 17 have been amended and 2, 5, 16, 19, and 30-58 have been cancelled. Applicants respectfully request that the amendments being filed herewith be entered and request that there be reconsideration of all pending claims.

Allowable Subject Matter

Applicants acknowledge and thank the Examiner's indication in the Office Action that claims 6-19 and 21 would be allowable if rewritten to include all of the limitations of the base claim and any intervening claims. In addition, Applicants acknowledge and thank the Examiner's indication in the Office Action that claim 27 is in condition for allowance. New independent claim 59 and 80 include the features of claim 1 and 6, and 1, 6, and 27. Accordingly, the Examiner is respectfully requested to place claims 59-86 in condition for allowance.

CLAIMS

CLAIM 1

Claim 1 is rejected under 35 U.S.C. §102(e) or 103(a) as obvious over Matsumura (U.S. Patent Application 2004/0134577), and rejected under 102(b) or 103(a) as obvious over Brinton (U.S. Patent 5,997,911), as described in detail in the Office Action. Amended claim 1 states:

A composition, comprising:

a metal nitrate selected from d-block metal nitrates and f-block metal nitrates, ***wherein the metal nitrate is selected from iron (III) nitrate, cobalt (II) nitrate, nickel (II) nitrate, cerium (III) nitrate and cerium (IV) nitrate;*** and

a metal salt having weakly bound counter anions, wherein the metal of the metal salt having weakly bound counter anions is selected from a d-block metal and an f-block metal.

(Emphasis added) Applicants traverse each of the §102 and 103 rejections in the Office Action and submit that the rejection of claim 1 under 35 U.S.C. §103 in view of each

reference noted above should be withdrawn because the references, individually or in combination, do not disclose, teach, or suggest each and every feature of claim 1 above. In this regard, Matsumura and Brinton do not, individually or in combination, disclose, teach, or suggest that "the metal nitrate is selected from iron (III) nitrate, cobalt (II) nitrate, nickel (II) nitrate, cerium (III) nitrate and cerium (IV) nitrate" as recited in claim 1. Thus, the rejection of claim 1 should be withdrawn.

Claims 1, 3-4, 6-15, 17-18, 20-23, and 83-86

Applicants respectfully submit that pending dependent claims 1, 3-4, 6-15, 17-18, 20-23, and 83-86 include every feature of independent claim 1 and that Matsumura and Brinton each fail to disclose, teach, or suggest, individually or in combination, at least the features of claim 1 highlighted hereinabove. Thus, pending dependent claims 1, 3-4, 6-15, 17-18, 20-23, and 83-86 are also allowable over the prior art of record. In re Fine, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Claim 24

Claim 24 is allowable for the same reasons as claim 1. Namely, Matsumura and Brinton do not, individually or in combination, disclose, teach, or suggest that "the metal nitrate is selected from iron (III) nitrate, cobalt (II) nitrate, nickel (II) nitrate, cerium (III) nitrate and cerium (IV) nitrate" as recited in claim 24. Thus, the rejection of claim 24 should be withdrawn.

Claims 25 and 26

Applicants respectfully submit that pending dependent claims 25 and 26 include every feature of independent claim 24 and that Matsumura and Brinton each fail to disclose, teach, or suggest, individually or in combination, at least the features of claim 24 highlighted hereinabove. Thus, pending dependent claims 25 and 26 are also allowable over the prior art of record. In re Fine.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known since the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'CBL', is written over a horizontal line.

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